

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

VOLKSWAGEN AG, VOLKSWAGEN OF
AMERICA, INC. and BUGATTI
INTERNATIONAL, S.A.

Plaintiffs and Counterclaim Defendants,

v.

THE BUGATTI, INC.

Defendant and Counterclaim Plaintiff.

Civil Action No. 05-11067-PBS

**REQUEST FOR CASE MANAGEMENT CONFERENCE TO
FACILITATE SETTLEMENT**

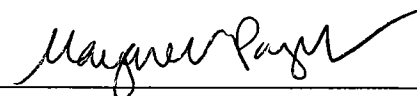
Pursuant to Local Rules 16.3(c), 16.3(a)(1), 16.4(a) and 16.4(b), Plaintiffs request that the Court convene a Case Management Conference to be presided over by a judicial officer for the purpose of facilitating ongoing settlement negotiations.

The parties have engaged in settlement discussions and have exchanged a number of proposals for an amicable resolution of this case. At this point, Plaintiffs believe judicial assistance would be useful in facilitating these negotiations and therefore respectfully request that the Court schedule a Case Management Conference and refer the case to a judicial officer for settlement purposes as soon as practicable.

Respectfully submitted,

**VOLKSWAGEN AG,
VOLKSWAGEN OF AMERICA, INC.
BUGATTI INTERNATIONAL, S.A.**

By their attorneys,

A handwritten signature in black ink, appearing to read "Margaret Paget", is written over a horizontal line.

David A. Brown (BBO# 556161)
Margaret H. Paget (BBO# 567679)
SHERIN AND LODGEN LLP
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and

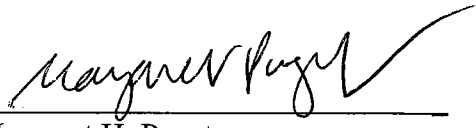
Susan B. Flohr, Esq.
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Lisa J. Savitt, Esq.
BLANK ROME LLP
600 New Hampshire Ave., NW
Washington, DC 20037

Dated: February 28, 2006

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2006 I served upon the below-named counsel the foregoing Request for Case Management Conference to Facilitate Settlement via facsimile and First Class Mail:

H. Joseph Hameline, BBO # 218710
Geri L. Haight, BBO # 638185
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Margaret H. Paget